

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

AMERICAN PATENTS LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:19-cv-765
)	
TP-LINK TECHNOLOGIES CO., LTD.,)	
)	
Defendant.)	

**DEFENDANT’S CONSENT MOTION FOR THIRD EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant TP-Link Technologies Co., Ltd., through their undersigned counsel, move, without waiving any defenses described or referred to in Federal Rule of Civil Procedure 12, and pursuant to Federal Rule of Civil Procedure 6, for a 30-day extension of time up to and including January 30, 2020, to answer or otherwise respond to Plaintiff’s Complaint. In support of its Motion, Defendant states as follows:

1. Plaintiff filed the Complaint for Patent Infringement on October 18, 2019.
2. Plaintiff had a summons issued and it was served on Defendant (via the Texas Secretary of State) on October 24, 2019.
3. Under the summons, a response to the Complaint was due November 14, 2019.
4. Defendant’s counsel conferred with Plaintiff’s counsel, and Plaintiff’s counsel agreed with and filed a first Unopposed Application for Extension of Time to Answer Complaint.

5. The first Unopposed Application for Extension was granted by the Court, and extended the initial deadline to respond to the Complaint by 30 days to December 16, 2019.
6. Defendant's counsel and Plaintiff's counsel engaged in initial settlement talks, and Plaintiff's counsel agreed with and filed a second Unopposed Application for Extension of Time to Answer Complaint.
7. The second Unopposed Application for Extension was granted by the Court, and extended the deadline to respond to the Complaint by 15 days to December 31, 2019.
8. Defendant's counsel transmitted a settlement offer to Plaintiff's counsel on December 20, 2019.
9. Defendant's counsel conferred with Plaintiff's counsel on December 30, 2019 regarding the settlement offer.
10. Plaintiff's counsel agreed that due to the recent holidays, additional time for settlement talks is needed.

WHEREFORE Defendant respectfully requests an extension of time up to and including January 30, 2020 to continue settlement talks and/or answer or otherwise respond to Complaint.

Respectfully submitted,

By: /s/ Matthew A. Braunel
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*Attorneys for Defendant TP-Link
Technologies Co., Ltd.*

December 30, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of December, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system for service upon the parties and counsel of record.

/s/ Matthew A. Braunel